

State Water Resources Control Board

Division of Drinking Water

November 4, 2016

System No. 3500006

Mr. Arman Nazemi, Assistant Public Works Director
San Benito County
CSA No. 31 Stonegate Water System
2301 Technology Parkway
Hollister, CA 95023

CITATION NO. 02_05_16C_019

LEAD AND COPPER MONITORING AND REPORTING VIOLATION FOR 2016

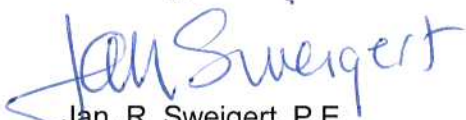
Enclosed is a Citation issued to the CSA No. 31 Stonegate (hereinafter "Stonegate") public water system.

The Stonegate water system will be billed at the State Water Resources Control Board's (hereinafter "State Board") hourly rate for the time spent on issuing this Citation. California Health and Safety Code, Section 116577, provides that a public water system must reimburse the State Board for actual costs incurred by the State Board for specified enforcement actions, including but not limited to, preparing, issuing and monitoring compliance with a citation. At this time, the State Board has spent approximately two hour(s) on enforcement activities associated with this violation.

The Stonegate water system will receive a bill sent from the State Board in August of the next fiscal year. This bill will contain fees for any enforcement time spent on the Stonegate water system for the current fiscal year.

If you have any questions regarding this matter, please contact Shaminder Kler of my staff at (831) 655-6938 or me at (831) 655-6934.

Sincerely,



Jan. R. Sweigert, P.E.
District Engineer, Monterey District Office
Northern California Field Operations Branch
Division of Drinking Water

Enclosures

Certified Mail No. 7008-1830-0004-5435-2114

cc San Benito County Environmental Health Department

STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

Name of Public Water System: CSA No. 31 Stonegate Water System

Water System No: 3500006

Attention: Mr. Arman Nazemi, Assistant Public Works Director
2301 Technology Parkway
Hollister, CA 95023

Issued: November 4, 2016

CITATION FOR NONCOMPLIANCE
LEAD AND COPPER MONITORING AND REPORTING VIOLATION
CALIFORNIA CODE OF REGULATIONS, TITLE 22, SECTION 64675
2016

The California Health and Safety Code (hereinafter "CHSC"), Section 116650 authorizes the State Water Resources Control Board (hereinafter "State Board") to issue a citation to a public water system when the State Board determines that the public water system has violated or is violating the California Safe Drinking Water Act (hereinafter "California SDWA"), (CHSC, Division 104, Part 12, Chapter 4, commencing with Section 116270), or any regulation, standard, permit, or order issued or adopted thereunder.

The State Board, acting by and through its Division of Drinking Water

(hereinafter "Division") and the Deputy Director for the Division, hereby issues this citation pursuant to Section 116650 of the CHSC to the CSA No. 31 Stonegate Water System (hereinafter "Stonegate") for violation of CHSC, Section 116555(a)(1) and California Code of Regulations (hereinafter "CCR"), Title 22, Section 64675.

A copy of the applicable statutes and regulations are included in Appendix 1, which is attached hereto and incorporated by reference.

STATEMENT OF FACTS

The Stonegate water system is classified as a community water system with a population of 252, serving 77 connections. The Division received no results for the lead and copper samples taken during June through September 2016.

DETERMINATION

CCR, Title 22, Section 64675(b) states that during each period, each system conducting reduced tap sampling shall collect at least one lead and copper sample from the number of sites based on the number of people served specified in Table 64675-A under Reduced Tap Sampling. Section 64675(b)(2) states that the samples shall be collected during the months of June, July, August, or September, unless the Department approves an alternate set of four months based on a review of the system's operations and lead and copper data, in which case the system shall initiate sampling during the alternate set of four months when directed in writing to do so by the Department.

In accordance with CCR, Title 22, Section 64675, the Stonegate water

1 system was required to collect five (5) lead and copper tap samples during
2 the months of June, July, August, or September 2016. Therefore, the
3 Division has determined that the Stonegate water system violated CCR,
4 Title 22, Section 64675 during 2016.

6 DIRECTIVES

7 The Stonegate water system is hereby directed to take the following actions:

- 8
9 1. The Stonegate water system shall collect five (5) tap samples from its
10 distribution system and have them analyzed for lead and copper no
11 later than **December 31, 2016**. The samples sites must be chosen in
12 accordance with CCR, Title 22, Section 64676, and the samples must
13 be collected in accordance with Section 64677.
14
- 15 2. The Stonegate water system shall collect five (5) tap samples from its
16 distribution system **June, July, August, or September 2017** and
17 have them analyzed for lead and copper. The samples sites shall be
18 the same as those used for the sampling required in 2016 unless
19 written approval is received from the Division to change the sites. The
20 samples must be collected in accordance with CCR, Title 22, Section
21 64677.
22
- 23 3. Within 30 days of lead and copper tap sampling, the Stonegate water
24 system must submit a completed Form 141-R, a completed "Lead
25 and Copper Results Worksheet", and a copy of the laboratory results
26 from the five distribution tap samples. The required forms and an
27 informational packet on lead and copper monitoring are enclosed with
28 this citation.

1
2 4. If the results of the sampling required to be conducted in 2016 and
3 2017 do not exceed the action levels for lead and copper, the
4 Stonegate water system may resume triennial sampling at five sites
5 in accordance with CCR, Title 22, Section 64675.5.
6

7 All submittals required by this Citation shall be electronically submitted to the
8 Division at the following address with the appropriate file name as provided
9 in Appendix 3:

10
11 Jan Sweigert, P.E.
12 District Engineer, Monterey District Office
13 Dwpdist05@waterboards.ca.gov
14

15 The State Board reserves the right to make such modifications to this
16 Citation as it may deem necessary to protect public health and safety. Such
17 modifications may be issued as amendments to this Citation and shall be
18 effective upon issuance.
19

20 Nothing in this Citation relieves the Stonegate water system of its obligation
21 to meet the requirements of the California SDWA (CHSC, Division 104, Part
22 12, Chapter 4, commencing with Section 116270), or any regulation,
23 standard, permit or order issued or adopted thereunder.
24

25 **PARTIES BOUND**

26 This Citation shall apply to and be binding upon the Stonegate water
27 system, its owners, shareholders, officers, directors, agents, employees,
28 contractors, successors, and assignees.
29

SEVERABILITY

The directives of this Citation are severable, and the Stonegate water system shall comply with each and every provision thereof notwithstanding the effectiveness of any provision.

FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the State Board to: issue a citation with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any regulation, permit, standard, citation, or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the State Board to take action to suspend or revoke a permit that has been issued to a public water system if the public water system has violated applicable law or regulations or has failed to comply with an order of the State Board, and to petition the superior court to take various enforcement measures against a public water system that has failed to comply with an order of the State Board. The State Board does not waive any further enforcement action by issuance of this Citation.

Jan Sweigert

Jan R. Sweigert, P.E.
District Engineer, Monterey District Office
Northern California Field Operations Branch
Division of Drinking Water

11/4/2016
Date

**Appendices (3):**

1. Applicable Statutes and Regulations
2. Form 141-R and Lead and Copper Results Worksheet
3. Electronic Submittal Instructions

Certified Mail No. 7008-1830-0004-5435-2114

**APPENDIX 1. APPLICABLE STATUTES AND REGULATIONS FOR
CITATION NO. 02_05_16C_019**

NOTE: The following language is provided for the convenience of the recipient, and cannot be relied upon as the State of California's representation of the law. The published codes are the only official representation of the law. Regulations related to drinking water are in Titles 22 and 17 of the California Code of Regulations. Statutes related to drinking water are in the Health & Safety Code, the Water Code, and other codes.

California Health and Safety Code (CHSC):

Section 116271 states in relevant part:

- (a) The State Water Resources Control Board succeeds to and is vested with all of the authority, duties, powers, purposes, functions, responsibilities, and jurisdiction of the State Department of Public Health, its predecessors, and its director for purposes of all of the following:
- (1) The Environmental Laboratory Accreditation Act (Article 3 (commencing with Section 100825) of Chapter 4 of Part 1 of Division 101).
 - (2) Article 3 (commencing with Section 106875) of Chapter 4 of Part 1.
 - (3) Article 1 (commencing with Section 115825) of Chapter 5 of Part 10.
 - (4) This chapter and the Safe Drinking Water State Revolving Fund Law of 1997 (Chapter 4.5 (commencing with Section 116760)).
 - (5) Article 2 (commencing with Section 116800), Article 3 (commencing with Section 116825), and Article 4 (commencing with Section 116875) of Chapter 5.
 - (6) Chapter 7 (commencing with Section 116975).
 - (7) The Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Division 43 (commencing with Section 75001) of the Public Resources Code).
 - (8) The Water Recycling Law (Chapter 7 (commencing with Section 13500) of Division 7 of the Water Code).
 - (9) Chapter 7.3 (commencing with Section 13560) of Division 7 of the Water Code.
 - (10) The California Safe Drinking Water Bond Law of 1976 (Chapter 10.5 (commencing with Section 13850) of Division 7 of the Water Code).
 - (11) Wholesale Regional Water System Security and Reliability Act (Division 20.5 (commencing with Section 73500) of the Water Code).
 - (12) Water Security, Clean Drinking Water, Coastal and Beach Protection Act of 2002 (Division 26.5 (commencing with Section 79500) of the Water Code).
- (b) The State Water Resources Control Board shall maintain a drinking water program and carry out the duties, responsibilities, and functions described in this section. Statutory reference to "department," "state department," or "director" regarding a function transferred to the State Water Resources Control Board shall refer to the State Water Resources Control Board. This section does not impair the authority of a local health officer to enforce this chapter or a county's election not to enforce this chapter, as provided in Section 116500...
- (k)
- (1) The State Water Resources Control Board shall appoint a deputy director who reports to the executive director to oversee the issuance and enforcement of public water system permits and other duties as appropriate. The deputy director shall have public health expertise.
 - (2) The deputy director is delegated the State Water Resources Control Board's authority to provide notice, approve notice content, approve emergency notification plans, and take other action pursuant to Article 5 (commencing with Section 116450), to issue, renew, reissue, revise, amend, or deny any public water system permits pursuant to Article 7 (commencing with Section 116525), to suspend or revoke any public water system permit pursuant to Article 8 (commencing with Section 116625), and to issue citations, assess penalties, or issue orders pursuant to Article 9 (commencing with Section 116650). Decisions and actions of the deputy director taken pursuant to Article 5 (commencing with Section 116450) or Article 7 (commencing with Section 116525) are deemed decisions and actions taken, but are not subject to reconsideration, by the State Water Resources Control Board. Decisions and actions of the deputy director taken pursuant to Article 8 (commencing with Section 116625) and Article 9 (commencing with Section 116650) are deemed decisions and actions taken by the State Water Resources Control Board, but any aggrieved person may petition the State Water Resources Control Board for reconsideration of the decision or action. This subdivision is not a limitation on the State Water Resources Control Board's authority to delegate any other powers and duties.

Section 116650 states in relevant part:

- (a) If the department determines that a public water system is in violation of this chapter or any regulation, permit, standard, citation, or order issued or adopted thereunder, the department may issue a citation to the public water system. The citation shall be served upon the public water system personally or by certified

mail. Service shall be deemed effective as of the date of personal service or the date of receipt of the certified mail. If a person to whom a citation is directed refuses to accept delivery of the certified mail, the date of service shall be deemed to be the date of mailing.

(b) Each citation shall be in writing and shall describe the nature of the violation or violations, including a reference to the statutory provision, standard, order, citation, permit, or regulation alleged to have been violated.

(c) A citation may specify a date for elimination or correction of the condition constituting the violation.

(d) A citation may include the assessment of a penalty as specified in subdivision (e).

(e) The department may assess a penalty in an amount not to exceed one thousand dollars (\$1,000) per day for each day that a violation occurred, and for each day that a violation continues to occur. A separate penalty may be assessed for each violation.

California Code of Regulations, Title 22:

Section 64675 (General Requirements for Tap Sampling for Lead and Copper) states in relevant part:

(a) During each period, each system shall conduct standard tap sampling by collecting one sample from the number of sites based on the number of people served specified in table 64675-A under Standard Tap Sampling.

(b) During each period, each system conducting reduced tap sampling shall collect at least one sample from the number of sites based on the number of people served specified in table 64675-A under Reduced Tap Sampling, as follows:

(1) The sites shall be representative of the sites required for standard tap sampling.

(2) The samples shall be collected during the months of June, July, August, or September, unless the Department approves an alternate set of four months based on a review of the system's operations and lead and copper data, in which case the system shall initiate sampling during the alternate set of four months when directed in writing to do so by the Department,...

Section 64675.5 (Tap Sampling Frequency) states in relevant part:

(a) A system shall conduct standard tap sampling for two consecutive periods; thereafter, tap sampling frequency may be reduced pursuant to section 64675 (General Requirements for Tap Sampling for Lead and Copper) as follows:

(1) If a system has 90th percentile levels that do not exceed 0.005 mg/L for lead and 0.65 mg/L for copper for two consecutive periods, it may reduce the sampling to once every three years at the reduced number of sites;

(2) For systems that do not meet the criteria in paragraph (1), after two consecutive periods with no action level exceedance, the frequency may be reduced to annually at the reduced number of sites, if the system receives written approval from the Department based on its review of the system's data. After sampling for three years (including the initial sampling year) with no action level exceedance, the frequency may be reduced to once every three years at the reduced number of sites, if the system receives written approval from the Department.

Section 64676 (Sample Site Selection) states in relevant part:

(a) Each system shall identify a pool of sampling sites that:

- (1) Is large enough to ensure that the water system can collect the number of lead and copper tap samples required in section 64675 (General Requirements for Tap Sampling for Lead and Copper);
- (2) Meets the criteria in subsections (c) or (d), as applicable; and
- (3) Does not include faucets that have point-of-use or point-of-entry treatment devices designed to remove inorganic contaminants.

(b) Prior to identifying sampling sites, each system shall conduct an evaluation of its distribution system to determine the construction materials (lead, copper, and galvanized steel) exposed to the water. If necessary to ensure the sample site criteria is met, the system shall collect additional information during the course of its normal operations (e.g., checking service line materials when reading water meters, or performance maintenance activities) and from the following:

(1) All plumbing codes, permits, and records in the files of the building department(s) that indicate the plumbing materials installed within publicly and privately owned structures connected to the distribution system;

(2) All inspections and records of the distribution system that indicate the material composition of the service connections connecting a structure to the distribution system; and

(3) All existing water quality information, which includes the results of prior analyses of the system or individual structures connected to the system, indicating locations that may be particularly susceptible to high lead or copper concentrations.

(c) Each community water system shall:

(1) Identify a sampling pool of "tier 1" sampling sites consisting of single-family structures except that, when multiple-family residences comprise at least 20 percent of the structures served by a water system, the system may include these types of structures as "tier 1" sites in its sampling pool. The "tier 1" sampling sites shall

(A) Contain copper pipes with lead solder installed after 1982; or

- (B) Contain lead pipes; or
 - (C) Be served by a lead service line.
- (2) If there is an insufficient number of "tier 1" sites, complete its sampling pool with "tier 2" sampling sites, consisting of buildings, including multiple-family residences that:
- (A) Contain copper pipes with lead solder installed after 1982; or
 - (B) Contain lead pipes; or
 - (C) Are served by a lead service line.
- (3) If there is an insufficient number of "tier 1" and "tier 2" sampling sites, complete its sampling pool with "tier 3" sampling sites, consisting of single-family structures that contain copper pipes with lead solder installed before 1983. A system with an insufficient number of tier 1, 2 and 3 sites shall complete its sampling pool with representative sites (i.e., plumbing materials commonly found at other sites) throughout the distribution system.
- (e) Each system whose distribution system contains lead service lines shall draw 50 percent of the samples it collects during each period from sites that contain lead pipes, or copper pipes with lead solder, and 50 percent of the samples from sites served by a lead service line. A system that cannot identify a sufficient number of sites served by a lead service line shall collect first draw samples from all of the sites identified as being served by such lines.
- (f) A system that does not have enough taps that can provide first-draw samples shall submit written documentation to the Department identifying standing times and locations for enough non-first-draw samples to make up its sampling pool by the start of its next monitoring period.

Section 64677 (Sample Collection Methods for Taps) states in relevant part:

- (a) All tap samples for lead and copper collected pursuant to this chapter, with the exception of lead service line samples collected under section 64689 (Lead Service Line Sampling) and samples collected under subsection (d), shall be first-draw samples, pursuant to subsection (b).
- (b) A first-draw sample shall be one liter in volume and have stood motionless in the plumbing system of each site for at least six hours, but not more than twelve. Samples from residential housing shall be collected from the cold-water kitchen tap or bathroom sink tap. Samples from a non-residential building shall be collected at an interior tap from which water is typically drawn for consumption. Samples may be collected by the system or the system may allow residents to collect tap samples after instructing the residents of the sampling procedures specified in this section. To avoid problems of residents handling nitric acid, acidification of samples may be done up to 14 days after collection. After acidification to resolubilize the metals, the sample shall stand in the original container for the time specified by the method used pursuant to section 64670(c) before it can be analyzed. If a system allows residents to perform sampling, the system may not challenge, based on alleged errors in sample collection, the accuracy of sampling results.
- (c) A system shall collect each tap sample from the same site from which it collected a sample during the previous period. If the system cannot gain entry to a site in order to collect a tap sample, it may collect the tap sample from another site in its sampling pool as long as the new site meets the same criteria, and is as close as possible to the original site.
- (d) A system that does not have enough taps to supply first-draw samples may apply to the Department in writing to substitute non-first-draw samples. Such systems shall collect as many first-draw samples as possible and identify sampling times and locations that would likely result in the longest standing time for the remaining sites.

APPENDIX 2: FORM 141-R AND LEAD AND COPPER RESULTS WORKSHEET

Citation No. 02_05_16C_019

Form 141-AR

LEAD AND COPPER RULE SAMPLING REPORT

System's Name: _____

Type: ☐ CWS ☐ NTNCWS

Address: _____

Population: ☐ >100,000

☐ 50,001 to 100,000

☐ 10,001 to 50,000

☐ 3,301 to 10,000

☐ 501 to 3,300

☐ 101 to 500

☐ < 101

Telephone Number: _____

System ID Number: _____

Contact Person: _____

Sample

Date(s): _____

SAMPLE SITE IDENTIFICATION

Number of sample sites in each category:

- Single-family structures with copper pipes with lead solder installed after 1982; or contain lead pipes; or are served by lead service lines. (Tier 1) _____
- Multi-family structures with copper pipes with lead solder installed after 1982; or contain lead pipes; or are served by lead service lines. (Tier 2) _____
- Buildings containing copper pipes with lead solder installed after 1982; or contain lead pipes; or are served by lead service lines. (Tier 2) _____
- Single family structures with copper pipes with lead solder installed before 1983. (Tier 3 – use only if insufficient number of Tier 1 and Tier 2 sampling sites) _____
- Representative sites throughout the distribution system (sites w/ plumbing materials commonly found at other sites) (use only if insufficient number of Tier 1, 2, and 3 sites) _____

Total: _____

Number of lead service lines present in the distribution system: _____

Number of samples collected from sites served by lead service lines: _____

The following sources have been explored to determine the number of structures that have interior lead pipe or copper pipe with lead solder:

- | | |
|---|--|
| <input type="checkbox"/> Plumbing and/or building codes. | <input type="checkbox"/> Interviews with building inspectors |
| <input type="checkbox"/> Plumbing and/or building permits. | <input type="checkbox"/> Survey of service area plumbers about when and where lead solder was used from 1982 to present. |
| <input type="checkbox"/> Contacts with the building department, Municipal clerk's office, or state regulatory agencies. | <input type="checkbox"/> Survey of residents. |
| <input type="checkbox"/> Water quality data. | <input type="checkbox"/> Interviews with local contractors & developers. |

The following sources have been explored to determine the number of lead service lines in the distribution system:

- ☐ Distribution system maps and record drawings.
- ☐ Capitol improvement plans and/or master plans for distribution system development.
- ☐ Standard operating procedures and/or operation & maintenance manuals for the types of materials used for service connections.
- ☐ Utility records including meter installations, customer complaint investigations .
- ☐ Water quality data.
- ☐ Interviews with senior personnel.
- ☐ Conduct service line sampling where lead service lines are suspected to exist.
- ☐ Review of permit files

- ☐ Survey of residents.
☐ Interviews with local pipe supplies, contractors and/or developers.

RESULTS OF SAMPLING

Results of Lead and Copper Tap Water Samples: *(Attach copy of all laboratory results to this form.)*

Number of tap samples required: _____ 90th Percentile Lead level: _____ mg/L

Number of tap samples collected & submitted: _____ 90th Percentile Copper level: _____ mg/L

Results of Water Quality Parameter (WQP) Samples: *(Complete only if system is required to collect WQP samples.)*

Number of WQP samples required to be collected: _____

Number of WQP samples collected & submitted: _____

Number of WQP entry point samples required to be collected: _____

Number of WQP entry point samples collected and submitted: _____

CERTIFICATION OF COLLECTION METHODS

I certify that:

- Each first draw tap sample for lead and copper is one liter in volume and has stood motionless in plumbing system of each sampling site for at least six hours.
- Each first draw sample collected from a single-family residence has been collected from the cold water kitchen tap or bathroom sink tap.
- Each first draw sample collected from a non-residential building has been collected at an interior tap from which water is typically drawn for consumption.
- Each first draw sample collected during an annual or triennial monitoring period has been collected in months of June, July, August, or September.
- Each resident who volunteered to collect tap water samples from his or her home has been properly instructed in the proper methods for collecting lead and copper samples. I do not challenge the accuracy of those sampling results.
- **Enclosed is a copy of the material distributed to residents explaining the proper collection methods, and a list of the residents who performed sampling.**

CHANGE OF SAMPLING SITES

Original site address: _____

New site address: _____

Distance between sites (approximately): _____

Targeting Criteria:	New Site:	<input type="checkbox"/> Tier 1 <input type="checkbox"/> Tier 2 <input type="checkbox"/> Tier 3	Old Site:	<input type="checkbox"/> Tier 1 <input type="checkbox"/> Tier 2 <input type="checkbox"/> Tier 3
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Reason for sample site change:

SIGNATURE:

DATE:

Print Name

Title

Lead and Copper Results Worksheet

System Name: _____

Sample Date(s): _____

Determine the 90th Percentile Lead and Copper Levels:

1. List all of the samples in Table 1 below. If the system collected more than the minimum number of required samples, all samples collected must be analyzed and the results listed in Table 1 below.
2. Circle the highest three values for both lead and copper.
3. Determine the 90th percentile lead level by following the instructions given in Table 2.

Write down the 90th Percentile level for Lead = _____ mg/L (action level = 0.015 mg/L)

4. Determine the 90th percentile copper level by following the instructions given in Table 2.

Write down the 90th Percentile level for Copper = _____ mg/L (action level = 1.3 mg/L)

Table 1 - Sample Results

	Sample Address	Lead Level (mg/L)	Copper Level (mg/L)
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			

Table 2 - Determining the 90th Percentile Lead or Copper Level

Number of Tap Samples Collected	How to Determine the 90th Percentile Lead or Copper Level
5 to 7	Average the two highest sample results to get the 90th percentile level.
8 to 12	The 90th percentile level is the second highest sample result.
13 to 17	Average the second and third highest sample results to get the 90th percentile level.
18 to 22	The 90th percentile level is the third highest sample result.

APPENDIX 3: GUIDELINES FOR ELECTRONIC SUBMISSION OF DOCUMENTS

Citation No. 02_05_16C_019

To ensure consistent and reliable processing of the documents you submit to the Division of Drinking Water (DDW), please follow the formatting, labeling, and submission procedures described below:

CREATION OF ELECTRONIC DOCUMENTS (PDF FILES)

For more efficient processing, we request that you submit all documents to DDW offices **in a Portable Document Format (PDF) file.**

Please note that after review of your submission, DDW staff may request a hardcopy of certain documents, particularly drawings or maps that require a large size to be readable. In other cases – for instance, where the evaluation of data is required – DDW staff may request that documents be submitted in other electronic formats.

1) Convert your submittal into PDF format. The PDF file should:

- a. Have a one-to-one relationship between the document being created and the information within the document. For example: If you are submitting both monthly bacteriological results and a monthly treatment plant monitoring report, you would create two separate documents: one document labeled appropriately for the bacteriological results and one document labeled appropriately for the treatment plant monitoring report.
- b. Contain the entire document, maintaining organization and layout, including page orientation, size, margins, fonts, table formats, page numbers, etc.
- c. Be clear and legible.
- d. Be named per the instructions in Item #2 below.
- e. Allow the reviewer to copy text and images into common word processing documents. For scanned documents, the document should be processed using Optical Character Recognition (OCR). If you do not have this technology, we will attempt to process the document using OCR as deemed necessary.

Note: Where a signature is specifically required by law or regulation, you should sign the document prior to converting to a PDF file and maintain the signed hardcopy of the document in your records for the period of time prescribed in the law or regulation.

2) Name each individual PDF file as follows:

- a. Create a filename with the following information:
 - i. Water System Number—(e.g. 1234567)
 - ii. Water System Name—(e.g. ABC Water Company)
 - iii. Compliance Period—Year and month or quarter that the document covers, if applicable—(e.g. 2015July).

- iv. Document Link—Use the following table to choose the Document Link that applies to the document you are submitting:

Document Link	Documents Pertaining to:
TCR	Monthly monitoring and summaries for the Total Coliform Rule and Revised Total Coliform Rule (RTCR) (routine distribution system bacteriological monitoring data)
SWTR	Monthly treatment plant monitoring reports for surface water
WTP	Monthly treatment plant monitoring reports, non-surface water
RAWB	Raw (source) water bacteriological data
RAWC	Raw water chemical monitoring data
LT2	Raw water monitoring in accordance with Long Term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR)
LCR	Lead and copper tap sampling data
PN	Public notification documents
MRDL	Disinfectant running annual average reporting
DBP	Disinfection byproduct reporting
GP	Distribution monitoring for general physicals
QPR	Quarterly progress report

Note: If there is not an applicable Document Link in the table above, use a word that describes the subject of the document you are submitting.

Example of complete filename: 1234567-ABC Water Company-2015July-TCR

SUBMISSION OF ELECTRONIC DOCUMENTS

1) Submission via Email

Note: DDW email servers can only receive emails less than or equal to 50 megabytes (50 MB) in size

- a. Attach **one** PDF file to an email. Enter the same information in the Subject line of the email as you used in the filename for the attachment to the email (e.g., "1234567-ABC Water Company-2015July-TCR"); see Item # 2 above for instructions. Send to: dwpdist05@waterboards.ca.gov

OR

- b. For **each** water system - attach *multiple* PDF files to an email, ensuring total size is less than 50 MB.

This option should only be utilized if all of the PDF files to be attached to one email pertain to the same water system. Please do not attach PDF files for multiple water systems on one email. Enter the water system number, name, and date in the Subject line of the email (e.g., "1234567-ABC Water Company-July2015"). Send to: dwpdist05@waterboards.ca.gov

Note: If emails with PDF attachments are not sent according to (a) or (b), the Division will reply to the email submittal with instructions for a correct re-submittal.

2) Submission of files greater than 50 MB in size

- a. Split documents into files smaller than 50 MB total and email per instructions in #1 above; OR
- b. Upload your documents to a DDW FTP website. Contact the DDW District office that oversees your water system for further details; OR
- c. Transfer to a CD-ROM. **After transfer to CD-ROM, verify it is readable.** Label the jewel case or envelope of the CD-ROM with the water system number and name (e.g., "1234567-ABC Water Company"). Mail to the following address:

State Water Resources Control Board – Division of Drinking Water
1 Lower Ragsdale Dr., Bldg 1, Suite 120
Monterey, CA 93940

3) Submitting checks for payment of fees

The DDW does not accept electronic transfer of funds. Please continue to **mail** all checks to the address you normally send them to, along with a paper cover letter and any necessary attachments.

Special instructions regarding laboratories:

Please notify your laboratory of our electronic submission requirements for routine submittals. (This only affects documents that labs routinely submit via email or hardcopy). Please note that labs must continue submitting chemical monitoring data through electronic data transfer (EDT) using the established procedure, as described at:

http://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/EDT.shtml.

Use of this guidance and updates:

Please be advised that not following the formatting guidelines above may cause a delay in the review of your submission, and you may be requested to resubmit document(s). This guidance may be updated periodically to reflect the evolving nature of the technology and the experience of those using this technology. You will be notified of any changes that affect your water system.